

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHRISTOPHER LAIRD,

Plaintiff,

-vs-

Case No: 08 CV 0888

McALLISTER TOWING,

Defendant.

ROBERTA E. ASHKIN (#115461515)

Local Counsel

580 Broadway, Ste. 906

New York, NY 10012

212-965-0010

212-965-1301 - fax

robertaashkin@aol.com

MOTION TO ADMIT COUNSEL PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York, I, Roberta E. Ashkin, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

Dennis M. O'Bryan
O'Bryan Baun Cohen Kuebler
401 S. Old Woodward, Ste. 320
Birmingham, MI 48009
(248) 258-6262
(248) 258-6047 - fax

Dennis M. O'Bryan is a member in good standing of the Bar of the State of Michigan.

There are no pending disciplinary proceedings against Dennis M. O'Bryan.



ROBERTA E. ASHKIN (#115461515)

Local Counsel

580 Broadway, Ste. 906

New York, NY 10012

212-965-0010

212-965-1301 - fax

robertaashkin@aol.com

Dated: 2/4/2008

CERTIFICATE OF SERVICE

The undersigned does hereby certify that on the 4th day of February, 2007 a copy of the foregoing was forwarded via first class mail with postage fully prepaid thereon to:

McAllister Towing
1700 Battery Place, Ste. 100
New York, NY 10004



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHRISTOPHER LAIRD,

Plaintiff,

-vs-

Case No: 08 CV 0888

McALLISTER TOWING,

Defendant.

_____/

STATE OF NEW YORK)
)SS
COUNTY OF)

AFFIDAVIT OF ROBERTA E. ASHKIN
IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE

Roberta E. Ashkin, being duly sworn, deposes and says as follows:

1. I am counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Dennis M. O'Bryan as counsel pro hac vice to represent Plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in 1979. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have known Dennis M. O'Bryan since 2007.

4. Dennis M. O'Bryan is associated with the firm of O'Bryan Baun Cohen Kuebler in Birmingham, Michigan.

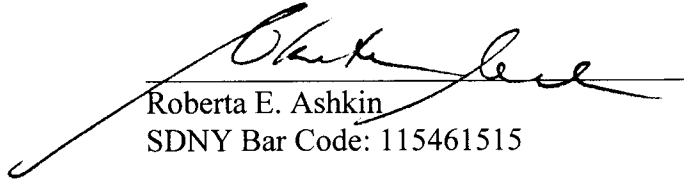
5. I have found Dennis M. O'Bryan to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Civil Procedure.

6. Accordingly, I am pleased to move the admission of Dennis M. O'Bryan, pro hac vice.


7. I respectfully submit a proposed order granting the admission of Dennis M. O'Bryan, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Dennis M. O'Bryan, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

Respectfully submitted,


Roberta E. Ashkin
SDNY Bar Code: 115461515

Subscribed and sworn to before me
this 22 day of January, 2008.



SCOTT A. FURMAN
Notary Public, State of New York
ID # 6061271
Qualified in New York County
Commission Expires May 31, 20 10

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHRISTOPHER LAIRD,

Plaintiff,

-vs-

Case No: 08 CV 0888

McALLISTER TOWING,

Defendant.

_____ /

ORDER FOR ADMISSION PRO HAC VICE
ON WRITTEN MOTION

Upon the motion of Robert E. Ashkin, attorney for Plaintiff and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Dennis M. O'Bryan
O'Bryan Baun Cohen Kuebler
401 S. Old Woodward, Ste. 320
Birmingham, MI 48009
(248) 258-6262
(248) 258-6057 fax
dob@obryanlaw.net

is admitted to practice pro hac vice as counsel for Plaintiff in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall

immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of the Court.

Dated:

United States District Judge

THE SUPREME COURT of the STATE OF MICHIGAN

I, Corbin R. Davis, Clerk of the Michigan Supreme Court and Custodian of the Roll of Attorneys admitted to the practice of law in this state, do hereby certify that, as appears from the records,

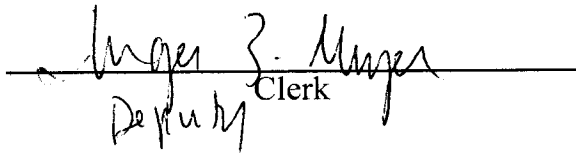
Dennis Michael O'Bryan

was admitted to the practice of law in the courts of the State of Michigan on

November 15, 1979

and has remained in good standing since then.

In Testimony Whereof, I set my hand and
affix the seal of the Michigan Supreme
Court on this date: January 31, 2008


Deputy Clerk